



New Mexico and does not transact business in New Mexico. Sotera Health LLC is the parent company and sole owner of Defendant Sterigenics U.S., LLC (“Sterigenics U.S.”), and is legally separate and distinct from Sterigenics U.S. Sotera Health LLC does not own or operate Sterigenics U.S.’s sterilization facility in Santa Teresa, New Mexico that is at issue in this case.

4. Sotera Health LLC respectfully denies that the Court has personal jurisdiction over it, under New Mexico’s Long Arm Statute and under federal due process. Sotera Health therefore filed its Rule 1-012(B)(2) Motion to dismiss this case against it for lack of personal jurisdiction with its initial responsive pleadings.

5. However, Sotera Health LLC elects to defend itself on the merits in this case and begin those proceedings against it in order to do so. Sotera Health LLC is confident that the evidence in this case will show, on the merits, that neither it nor any of the other Defendants have caused any injury alleged by Plaintiff. Sotera Health LLC therefore hereby withdraws its personal jurisdiction defense, participation in the Rule 1-012(B)(2) Motion, and Motion for Protective Order for that reason and purpose in the above-captioned case.

6. The Rule 1-012(B)(2) Motion and Motion for Protective Order remain pending for Defendants Sotera Health Holdings, LLC and Sotera Health Company. This Notice of Withdrawal with respect to Sotera Health LLC’s participation in those Motions does not withdraw or otherwise impact those Motions with respect to Sotera Health Holdings, LLC and Sotera Health Company or the personal jurisdiction defenses of Sotera Health Holdings, LLC and Sotera Health Company.

[signature on following page]

Respectfully submitted this 10<sup>th</sup> day of February, 2022.

MODRALL, SPERLING, ROEHL, HARRIS  
& SISK, P.A.

By: /s/ Alex C. Walker

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WE HEREBY CERTIFY that a true  
and correct copy of the foregoing was  
submitted through the Odyssey  
Electronic Filing System for filing and  
service to all counsel of record this 10<sup>th</sup>  
day of February, 2022.

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By: /s/ Alex C. Walker

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